

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GREG MCMAHON and ADAM
GOLDBERG,

Plaintiffs,

v.

GENERAC POWER SYSTEMS, INC.,

Defendant.

Civil Action No. 2:21-cv-05660

**SECOND UNOPPOSED MOTION FOR EXTENSION OF TIME
FOR DEFENDANT TO RESPOND TO COMPLAINT**

Defendant Generac Power Systems, Inc. (“Generac”), pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and Local Rule of Civil Procedure 7.4(b)(2), hereby respectfully requests that the Court enter an order extending the time by which Generac may respond to the Complaint filed by Plaintiffs Greg McMahon and Adam Goldberg (“Plaintiffs”). In support of its motion, Generac states as follows:

1. On January 14, 2022, Generac filed an Unopposed Motion for Extension of Time to Respond to Plaintiffs’ Complaint. (ECF No. 6.) Plaintiffs did not oppose this request.
2. This Court granted Generac’s Unopposed Motion for Extension of Time to Respond to Plaintiffs’ Complaint on January 21, 2022. (ECF No. 7.) Pursuant to this Court’s order, Generac’s deadline for responding to the Complaint is February 21, 2022.
3. Good cause exists for the second requested extension because Plaintiffs’ Complaint asserts multiple theories of liability in a putative interstate class action and Generac’s undersigned counsel requires additional time to review the allegations and prepare a response.
4. Generac respectfully requests that the Court extend Generac’s deadline for

responding to the Complaint to March 23, 2022, and set Plaintiffs' deadline for opposing that response to April 22, 2022.

5. Generac's counsel conferred with Plaintiffs' counsel regarding this request and certifies pursuant to Local Rule 7.1(b) that Plaintiffs do not oppose this request.

6. The parties agree that this second request is not made for the purpose of delay and that granting it will not prejudice any party.

WHEREFORE, for the reasons set forth above, Generac respectfully requests that the Court enter an order extending Generac's deadline for responding to the Complaint to March 23, 2022, and setting Plaintiffs' deadline for opposing that response to April 22, 2022.

Dated: February 14, 2022

FAEGRE DRINKER BIDDLE & REATH LLP

By: /s/ Michael P. Daly

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Generac Power Systems, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of February, 2022, a true and correct copy of the foregoing Second Unopposed Motion for Extension of Time for Defendant to Respond to Complaint was filed and served on all counsel of record via the Court's electronic filing system.

/s/ Meaghan V. Geatens
Meaghan V. Geatens

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**ORDER GRANTING SECOND UNOPPOSED MOTION FOR
EXTENSION OF TIME FOR DEFENDANT TO RESPOND TO COMPLAINT**

AND NOW, this _____ day of February, 2022, upon consideration of the Second Unopposed Motion for Extension of Time for Defendant to Respond to Complaint, **IT IS HEREBY ORDERED** that the Unopposed Motion is **GRANTED**. It is further **ORDERED** that Defendant Generac Power Systems, Inc.'s deadline for responding to Plaintiffs' Complaint shall be extended to March 23, 2022 and Plaintiffs' deadline for opposing that response shall be April 22, 2022.

Hon. Petrese B. Tucker
United States District Court Judge